

Michael P. Richman (MR 2224)  
Robert A. Scher (RS 2910)  
FOLEY & LARDNER LLP  
90 Park Avenue  
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-and-

Geoffrey Goodman  
Joanne Lee  
FOLEY & LARDNER LLP  
321 N. Clark Street, Suite 2800  
Chicago, IL 60610  
Phone: (312) 832-4500  
Fax: (312) 832-4700

*Attorneys for Appellants Langston Law Firm, PA,  
Joseph C. Langston, and Timothy R. Balducci*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

WORLDCOM, INC., et al.,

Debtors.

THE LANGSTON LAW FIRM, PA, JOSEPH  
C. LANGSTON, and TIMOTHY R.  
BALDUCCI,

Appellants,

v.

THE STATE OF MISSISSIPPI, STACEY  
PICKERING in his capacity as Auditor for the  
State of Mississippi, and PHIL BRYANT, in  
his capacity as former Auditor for the State of  
Mississippi,

Appellees.

Chapter 11  
Jointly Administered

Case No. 02-13533 (AJG)

Case No. 08-C-04331

Adversary Proceeding No. 07-02044 (AJG)

**MOTION TO ADMIT**

*PRO HAC VICE*

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Michael P. Richman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name: Joanne Lee  
Firm Name: Foley & Lardner LLP  
Address: 321 North Clark Street  
Suite 2800  
City/State/Zip: Chicago, IL 60610-4764  
Phone Number: (312) 832-4500  
Fax Number: (312) 832-4700

Joanne Lee is a member in good standing in the Bar of the State of Illinois. There are no pending disciplinary proceeding against Joanne Lee in any State or Federal court.

Dated: June 23, 2008  
New York, New York

FOLEY & LARDNER LLP

A handwritten signature in black ink, appearing to be 'Michael P. Richman', written over a horizontal line.

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-and-

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Joanne Lee (*admitted pro hac vice*)  
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**AFFIDAVIT OF MICHAEL P. RICHMAN**

**IN SUPPORT OF WRITTEN MOTION**

**TO ADMIT COUNSEL *PRO HAC VICE***

STATE OF NEW YORK     )  
                                      )     ss.:  
COUNTY OF NEW YORK    )

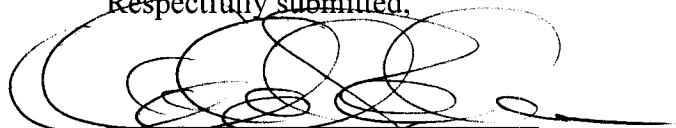
Michael Richman, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Foley & Lardner LLP, counsel for Appellants Langston Law Firm, PA, Joseph C. Langston, and Timothy R. Balducci in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Joanne Lee as counsel pro hac vice to represent Appellants Langston Law Firm, PA, Joseph C. Langston, and Timothy R. Balducci in this matter.
2. I am a member in good standing of the bar of the State of New York. I was admitted to practice law on December 17, 1979 in the District of Columbia, and I was admitted to practice law in New York on July 31, 1985. I am in good standing with this Court.
3. Joanne Lee is an associate at Foley & Lardner LLP in Chicago, Illinois.
4. Joanne Lee is a member in good standing in the Bar of the State of Illinois. A certificate of Good Standing from the Bar of the State of Illinois is attached as Exhibit A.
5. I understand Ms. Lee to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure. I know of no reason why Ms. Lee should not be admitted pro hac vice.
6. Accordingly, I am pleased to move the admission of Joanne Lee, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Joanne Lee, pro hac vice, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Joanne Lee, pro hac vice, to represent Appellants Langston Law Firm, PA, Joseph C. Langston, and Timothy R. Balducci in the above captioned matter, be granted.

Dated: June 23, 2008  
New York, NY

Respectfully submitted,



Michael P. Richman (MR 2224)

Sworn to before me this  
23 day of June 2008

Samantha S. Edite  
Notary Public, State of New York

SAMANTHA S. EDITE  
NOTARY PUBLIC, State Of New York  
No. 01ED6068678  
Qualified in Kings County  
Commission Expires Jan. 14, 20 10

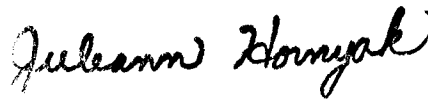
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Joanne Lee

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 4, 2004 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Tuesday, June 17, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

Michael P. Richman (MR 2224)  
Robert A. Scher (RS 2910)  
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Adversary Proceeding No. 07-02044 (AJG)

**ORDER FOR ADMISSION**

*PRO HAC VICE*

**ON WRITTEN MOTION**

Upon the motion of Michael P. Richman, attorney for Langston Law Firm, PA, Joseph C. Langston, and Timothy R. Balducci and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Joanne Lee  
Firm Name: Foley & Lardner LLP  
Address: 321 North Clark Street  
Suite 2800  
City/State/Zip: Chicago, IL 60610-4764  
Phone Number: (312) 832-4500  
Fax Number: (312) 832-4700  
Email Address: jlee@foley.com

is admitted to practice pro hac vice as counsel for Langston Law Firm, PA, Joseph C. Langston, and Timothy R. Balducci in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: June , 2008  
New York, New York

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United States District/Magistrate Judge

Michael P. Richman (MR 2224)  
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*Attorneys for Appellants Langston Law Firm, PA,  
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**AFFIDAVIT OF SERVICE**



Martie P. Kutscher, of full age, certifies as follows:

I am a Paralegal employed with the firm of Foley & Lardner LLP, Attorneys for Appellants The Langston Law Firm, PA, Joseph C. Langston and Timothy R. Balducci listed in the documents herein.

On the 23<sup>rd</sup> day of June, 2008 I served **MOTION TO ADMIT JOANNE LEE *PRO HAC VICE*** and **MOTION TO ADMIT GEOFFREY GOODMAN *PRO HAC VICE*** via United States first class mail upon:

The State of Mississippi c/o  
Hon. James Hood, Attorney General  
Office of the Attorney General  
450 High Street  
Gartin Building, 5<sup>th</sup> Floor  
Jackson, MS 39201

Arthur F. Jernigan, Esq.  
Craig M. Geno, Esq.  
Harris Jernigan & Geno, PLLC  
587 Highland Colony Parkway  
P.O. Box 3380  
Ridgeland, MS 39158-3380  
Phone: (601) 427-0048  
Fax: (601) 427-0050

Phil Bryant (or the current State Auditor)  
Mississippi Office of the State Auditor  
501 N. West Street  
Suite 801, Woolfolk Building  
Jackson, MS 39201  
Phone: (601) 576-2800  
Fax: (601) 576-2687

Andrew M. Kramer  
Otterbourg, Steindler, Houston &  
Rosen, P.C.  
230 Park Avenue  
New York, NY 10169-0075

Phone: (212) 661-9100

Fax: (212) 682-6104

RATTET, PASTERNAK & GORDON OLIVER, LLP

550 Mamaroneck Avenue

Harrison, New York 10528

Attn: Julie A. Cvek (9171)

Attn: James B. Glucksman, Esq.

Tel. No. (914) 381-7400

Fax No. (914) 381-7406

  
Martie P. Kutscher

Sworn to before me this

June 23, 2008



Notary Public, State of New York

SAMANTHA S. EDITE  
NOTARY PUBLIC, State Of New York  
No. 01ED6068678  
Qualified In Kings County  
Commission Expires Jan. 14, 20 10